

UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF WISCONSIN

IN RE
Darrell D. Edwards

Chapter: 13

Case No. 11-23195-MDM

Debtor.

**OBJECTION OF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR
MORGAN STANLEY ABS CAPITAL I INC. TRUST 2006-HE4 TO CONFIRMATION OF THE
CHAPTER 13 PLAN**

Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2006-HE4, a secured creditor, by its attorneys, Gray & Associates, L.L.P., objects to the confirmation of the proposed plan on the following grounds:

1. The creditor holds a secured interest in the real estate located at 3789 N 75th St, Milwaukee, WI 53216-1969.
2. The plan does not comply with the provisions of Chapter 13 in that:
 - (a) The creditor has not accepted the plan;
 - (b) The plan proposes to pay \$13,028.16 to the trustee. As the creditor's pre-petition mortgage arrearage claim alone exceeds \$14,835.73, the plan is not feasible.
3. The foregoing prevents confirmation of the debtors' plan pursuant to 11 U.S.C. section 1325.
4. The creditor's legal fees associated with this objection are \$400.00.

Drafted by:

Jay Pitner
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Gray & Associates, L.L.P. is attempting to collect a debt on our client's behalf and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

WHEREFORE, an objection is made to the confirmation of the plan, the creditor demands an award of its legal fees and costs associated with this objection, that a hearing upon this objection be scheduled and that the clerk issue notice of said hearing to the appropriate parties and that the secured creditor be awarded such and further relief as the court may deem to be just and equitable.

Dated this 24th day of March, 2011.

Gray & Associates, L.L.P.
Attorneys for Creditor

By: _____/s/_____
Jay Pitner
State Bar No. 1010692

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AFFIDAVIT OF SERVICE

STATE OF WISCONSIN)
)ss
WAUKESHA COUNTY)

Michelle M. Neil, being first duly sworn on oath deposes and says that I am an employee of the firm of Gray & Associates, L.L.P., attorneys for movant identified herein, and that on the __29th__ day of March, 2011, I electronically filed the annexed objection to confirmation of plan and that copies of these documents were mailed, properly enclosed in a postage paid envelope, or served electronically if the party accepts electronic service, to the following:

Mary B. Grossman Trustee
740 N. Plankinton Avenue, Suite 400
Milwaukee, WI 53203

Eastern District U.S. Trustee
517 E. Wisconsin Avenue, Room 430
Milwaukee, WI 53202

Rollie R. Hanson
6737 W Washington St Ste 1420
West Allis, WI 53214-5649

_____/s/_____
Michelle M. Neil

Subscribed and sworn to before me
this __29th__ day of March, 2011.

_____/s/_____
Laura Thoma, Notary Public
State of Wisconsin
My commission expires: 09/21/2014.